



**Wisconsin
Right to Life, Inc.**

**POLITICAL
ACTION
COMMITTEE**

Chair
Michael Moegenburg
Sheboygan

Andrew M. Bath
Milwaukee

James Erceg
Milwaukee

Betty Tassoni
Green Bay

Al Christianson
Madison

Donald Zahalka
Oshkosh

Jeanne Zahalka
Oshkosh

Pac Treasurer
Richard Fox

Legislative/Pac Director
Susan Armacost

March 5, 1999

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Richard M. Ng
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Dear Mr. Ng,

This letter is in response to your letter regarding our October Quarterly Report (8/20/98 - 9/30/98).

Regarding Items 1 and 2: I have corrected the Detailed Summary Page so that it shows the correct amount of \$52,209.74. The correct figure appeared on the cover Summary Page. By correcting this figure, Item 2 was also corrected. Thus, Column B on the Detailed Summary page is now correct. The corrected page is attached.

Regarding Item 3: The incurred debt owed to A to Z Printing was incurred during the reporting period of this report. However, a bill had not yet been received from them as of the filing of the report. This amount was carried over on our Schedule D Pre-primary 12 Day Report (10/1/98 - 10/14/98 but I see that I made an error by inadvertently listing Wisconsin Right to Life, Inc. as the vendor when it should have been A to Z Printing. The debt was finally retired and is reported as such on our 30 day Post Election Report (10/15/98 - 11/23/98).

Regarding Item 4: As we have previously discussed, in 1997, our organization had completely switched to a new computer system with new programs, etc. The program for our Federal Election Commission reports was inadequate because it did not have a category for aggregate totals for the year. Our staff tried to remedy this but we finally had to resort to hiring someone to revamp our program for the reports. That has now been done and in subsequent reports, the aggregates will be shown. We apologize for this...it was frustrating for all of us here, as well.

Regarding Item 5: I would like your guidance on this, Mr. Ng. We have always reported the wages of our PAC's employees as independent expenditures because all the expenditures we make that affect candidates are in the form of independent expenditures. Perhaps

thoughts on this.

To address the second part of Item 5, I will explain how we handle payroll in our office. We have a payroll company "cut" the payroll checks for all employees in our office. We have employees who work for Wisconsin Right to Life, Inc., the Wisconsin Right to Life Education Fund and employees who work for the Wisconsin Right to Life Political Action Committee. Some of work part-time for one component and part-time for another component of our organization. For example, I work for the PAC as PAC Director and as assistant treasurer but I am also the Legislative Director. The hours I spend as Legislative Director are hours spent working for Wisconsin Right to Life Inc., our corporation.

All of us submit weekly timesheets, specifying the hours we spent working and for which component of the organization. These timesheets are submitted to the individual in our office who gets everything ready for the payroll company. The individual in our office who receives the timesheets separates out all PAC hours before she submits anything to the payroll company. She *immediately* writes a check from the PAC account to Wisconsin Right to Life, Inc. to cover the amount for PAC payroll. This is done well before anything is sent to the payroll company and before anyone receives their payroll checks.

Then, when I receive my payroll check, I receive one check from Wisconsin Right to Life, Inc., which includes payment for my work for both the PAC and Wisconsin Right to Life, Inc.

We have been scrupulous in handling payroll in this manner in order to insure that the PAC is not illegally re-imbursing Wisconsin Right to Life, Inc. *after* payroll checks have been cut.

Sincerely,



Susan Armacost
Assistant Treasurer

DETAILED SUMMARY PAGE **OF RECEIPTS AND DISBURSEMENTS** **PAGE 2, FEC FORM 3X**

(revised 3/1/91)

NAME OF COMMITTEE <u>Wisconsin Right to Life PAC</u>		REPORT COVERING PERIOD FROM <u>8/20/98</u> TO <u>9/30/98</u>	
		COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts			
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committees			
i. Itemized (use Schedule A)		<u>23294.51</u>	<u>79836.55</u>
ii. Unitemized		<u>0</u>	<u>0</u>
iii. Total (add i and ii) >		<u>23294.51</u>	<u>79836.55</u>
b. Political Party Committees		<u>0</u>	<u>0</u>
c. Other Political Committees (such as PACs)		<u>0</u>	<u>0</u>
d. Total Contributions (add a-iii, b and c) >		<u>23294.51</u>	<u>79836.55</u>
12. Transfers From Affiliated/Other Party Committees		<u>1800.00</u>	<u>1800.00</u>
13. All Loans Received		<u>0</u>	<u>0</u>
14. Loan Repayments Received		<u>0</u>	<u>0</u>
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)		<u>0</u>	<u>0</u>
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees		<u>0</u>	<u>13.92</u>
17. Other Federal Receipts (Dividends, Interest, etc.)		<u>0</u>	<u>0</u>
18. Transfers from Nonfederal Account for Joint Activity		<u>0</u>	<u>0</u>
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >		<u>25094.51</u>	<u>81650.47</u>
20. Total Federal Receipts (subtract line 18 from line 19) >		<u>25094.51</u>	<u>81650.47</u>
B. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share		<u>0</u>	<u>0</u>
ii. Non-Federal Share		<u>0</u>	<u>722.60</u>
b. Other Federal Operating Expenditures		<u>0</u>	<u>722.60</u>
c. Total Operating Expenditures (add a i, ii, and b) >		<u>0</u>	<u>722.60</u>
22. Transfers to Affiliated/Other Party Committees		<u>0</u>	<u>0</u>
23. Contributions to Federal Candidates/Committees and Other Political Committees		<u>13216.83</u>	<u>36564.31</u>
24. Independent Expenditures (use Schedule E)		<u>0</u>	<u>0</u>
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)		<u>0</u>	<u>0</u>
26. Loan Repayments Made		<u>0</u>	<u>0</u>
27. Loans Made		<u>0</u>	<u>0</u>
28. Refunds of Contributions To:			
a. Individual/Persons Other Than Political Committees		<u>0</u>	<u>0</u>
b. Political Party Committees		<u>0</u>	<u>0</u>
c. Other Political Committees (such as PACs)		<u>0</u>	<u>0</u>
d. Total Contribution Refunds (add a, b and c) >		<u>0</u>	<u>0</u>
29. Other Disbursements		<u>937.80</u>	<u>14922.13</u>
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >		<u>13574.53</u>	<u>52209.04</u>
31. Total Federal Disbursements (subtract line 21 a ii from line 30) >		<u>13574.53</u>	<u>52209.04</u>
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans) (from line 11d)		<u>23294.51</u>	<u>79836.55</u>
33. Total Contribution Refunds (from line 28d)		<u>0</u>	<u>0</u>
34. Net Contributions (other than loans) (subtract line 33 from line 32)		<u>23294.51</u>	<u>79836.55</u>
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >		<u>0</u>	<u>822.60</u>
36. Offsets to Operating Expenditures (from line 15)		<u>0</u>	<u>0</u>
37. Net Operating Expenditures (subtract line 36 from line 35) >		<u>0</u>	<u>822.60</u>

Federal Election Commission

ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

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